

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

ALEXANDRIA DIVISION



UNITED STATES OF AMERICA

v.

Case No. 1:24-CR-194

EDMUND AUGUST BALZER IV,

Defendant.

STATEMENT OF FACTS

The United States and the defendant, EDMUND AUGUST BALZER IV, agree that at trial, the United States would have proven beyond a reasonable doubt and with admissible and credible evidence that, between on or about August 12, 2023 and on or about August 13, 2023, in Arlington County, Virginia, within the Eastern District of Virginia, the defendant used a means or facility of interstate or foreign commerce to knowingly distribute one or more visual depictions of minors engaging in sexually explicit conduct, as defined in 18 U.S.C. § 2256(1) & (2), the production of which involved the use of a minor engaging in such conduct.

In addition, the United States and the defendant agree that at trial, the United States would have proven the following facts, among others, beyond a reasonable doubt with admissible and credible evidence:

1. On August 12, 2023, the defendant chatted with an individual (hereinafter, "Witness-1") he had recently met on a dating application. After they met on the dating application, the parties transitioned their chat to an Internet-based encrypted messaging platform ("Application A").

2. During the chat on Application A, the defendant asked Witness-1 “Pervy?” When Witness-1 responded, “fuck yeah” and “how youn” the defendant said, “The younger the better[.]” The parties then had the following discussion about the sexual abuse of children:

Defendant	You ever touch young?
Witness-1	yeah but not in a while, you?
Defendant	Many times
Witness-1	how young do you go
Defendant	0
Witness-1	How young was the last one you touch
Defendant	2
Witness-1	Damn that's young
Witness-1	What you do with him
Defendant	That's how I like it
Defendant	Molested him and facefucked
Witness-1	pics?
Defendant	Not of that kid
Defendant	What's the youngest you've touched?
Witness-1	others are fine
Witness-1	let's see if we have the same taste
Defendant	Oh I think we do
Witness-1	I'll send you pics, if you send me some ;)
Defendant	Sure
Witness-1	u first

3. The defendant then sent Witness-1 a 10-second GIF¹ depicting an adult man anally penetrating a prepubescent boy.

4. The parties continued to chat on Application A. Later in the conversation, the defendant asked Witness-1 “Would you fuck a baby?” The defendant told Witness-1 he had a friend with a 4-month-old baby who would let them sexually abuse the baby.

¹ As is relevant here, a GIF is a soundless video that loops continuously without requiring the user to press play or restart the video.

5. Witness-1 reported the chat to the National Center for Missing and Exploited Children.

6. On August 18, 2023, law enforcement executed a search warrant at the defendant's residence in Arlington, Virginia. The defendant had in his exclusive possession a Google Pixel 6 cell phone (IMSI 310410938230893), a Memorex 1GB USB Thumb Drive (SN 7A8B68D8), and a CyberPower PC (SN 1990782-C3DLNU8E).

7. The defendant's Google Pixel 6 cell phone contained images and videos depicting minors engaged in sexually explicit conduct. For example, the defendant had a 14-second video that depicted an adult man penetrate the vagina of a prepubescent female with his penis.

8. The defendant's Memorex Thumb Drive contained 41 videos depicting minors engaged in sexually explicit conduct. For example, the defendant had a 5-minute video that depicted an adult man anally penetrate a toddler with his penis. The video was created on the thumb drive on September 7, 2019.

9. The defendant's CyberPower PC contained images depicting minors engaged in sexually explicit conduct. The CyberPower PC also contained records of Internet searches for "baby rape" among other things.

10. After the search warrant on August 18, 2023, the defendant used a different messaging Application to chat with another user about minors. The other user sent the defendant child pornography.

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11. This statement of facts includes those facts necessary to support the plea agreement between the defendant and the United States. It does not include each and every fact known to the

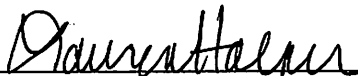
defendant or to the United States, and it is not intended to be a full enumeration of all of the facts surrounding the defendant's case.

12. The actions of the defendant, as recounted above, were in all respects knowing and deliberate, and were not committed by mistake, accident, or other innocent reason.

Respectfully submitted,

Jessica D. Aber
United States Attorney

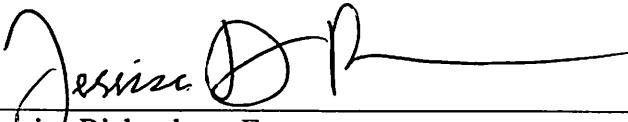
Date: October 23, 2024

By: 
Lauren Halper
Vanessa Strobbe
Assistant United States Attorneys

After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, EDMUND AUGUST BALZER IV, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.


EDMUND AUGUST BALZER IV

I am Jessica Richardson, the defendant's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.


Jessica Richardson, Esq.
Attorney for EDMUND AUGUST BALZER IV